

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

BID FOR POSITION, LLC,

Plaintiff,

v.

AOL LLC and GOOGLE INC.,

Defendants.

CASE NO. 2:07-cv-582 JBF/TEM

Jury Trial Demanded

**DEFENDANTS GOOGLE AND AOL’S MOTION FOR SUMMARY JUDGMENT
OF NONINFRINGEMENT OF U.S. PATENT NO. 7,225,151**

Defendants Google Inc. and AOL LLC (collectively, “Defendants”), by counsel, pursuant to Rule 56 of the Federal Rules of Civil Procedure and the Local Rules of Practice for the United States District Court for the Eastern District of Virginia, respectfully move for summary judgment of noninfringement of U.S. Patent No. 7,225,151 against the Plaintiff, Bid For Position. The grounds and authorities in support of this Motion are set forth in Defendants Google and AOL’s Memorandum in Support of Their Motion for Summary Judgment, the Declaration of Emily C. O’Brien, with exhibits, the Declaration of Clayton W. Bavor, Jr., with exhibits, and the Declaration of Rohit Rao, with exhibits, filed with this Motion.

Dated: July 24, 2008

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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I also certify that on July 24, 2008, I will effect hand-delivery of the foregoing in accordance with Federal Rule of Civil Procedure 5(b)(2)(A) to the following:

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